

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

-----X  
SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X  
CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION OF  
MAYRA GOMEZ IN FURTHER  
SUPPORT OF PLAINTIFF'S ORDER TO  
SHOW CAUSE FOR CONTEMPT, FOR  
AN ORDER OF ATTACHMENT  
PURSUANT TO RULE 64 OF THE  
FEDERAL RULES OF CIVIL  
PROCEDURE & ARTICLE 62 OF THE  
NEW YORK CIVIL PRACTICE LAW  
& RULES, AND IN SUPPORT OF  
PLAINTIFF'S RENEWED MOTION FOR  
A PRELIMINARY INJUNCTION  
DIRECTING DEFENDANTS TO CEASE  
OPERATING IME COMPANIONS LLC  
AND ANY OTHER ENTITIES THAT  
COMPETE WITH PLAINTIFF**

Mayra Gomez declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the  
following is true and correct:

1. I am an independent contractor who performs services for IME WatchDog, Inc. (“IME WatchDog”), the Plaintiff in this case, as an observer of independent medical examinations (“IMEs”).

2. As such, I am fully familiar with the facts and circumstances set forth below, based upon the facts known to me to be true, my review of books, records, and Court Orders maintained by the Plaintiff and conversations I have had with officers of the Plaintiff.

3. I previously accepted work assignments from IME Companions LLC; however, I stopped performing services for Defendants when Safa Abdulrahman Gelardi (hereinafter “Safa”) spoke to me in a belligerent tone over a payment dispute.

4. When this occurred, I researched on my own what other companies provided IME observer services so that I can continue to work in this field.

5. This is how I came to find IME WatchDog.

6. I also independently learned that there was a lawsuit in which both IME WatchDog and IME Companions were involved in, and specifically read this Court’s May 13, 2022 and June 2022 decisions.

7. I also recently learned of this Court’s order dated Friday March 10, 2023, which temporarily restrained the Defendants from continuing to operate their business.

8. In the IME observer industry, integrity is one of the most important traits to have, especially when nobody is looking.

9. I therefore felt compelled to come forward and state that I personally witnessed agents of IME Companions violating this Court’s most recent March 10, 2023, order. Specifically, on Thursday March 16, 2023, at approximately noon, I observed Jeff Beiben (hereinafter “Jeff”), an agent of IME Companions at an IME located at 28 Sycamore Lane, Commack, NY 11725.

10. I was shocked and surprised to see Jeff at this IME given the recent March 10, 2023 order just six (6) days later.

11. Although I did not engage with him, as I have been previously advised by IME WatchDog to refrain from any contact with the Defendants, to the best of my knowledge, Beiben remains employed by the Defendants.

12. Attached as Exhibits A, B, and C are pictures that contain a fair and accurate representation of what I witnessed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March  
\_\_\_\_\_, 2023.

*Mayra Gomez*

\_\_\_\_\_  
Mayra Gomez






# 2023-03-22 Gomez Reply Decl

Final Audit Report

2023-03-22

Created:	2023-03-22
By:	Emanuel Kataev (mail@emanuelkataev.com)
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